

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

IN RE:

**ARREST WARRANT FOR
LARRY SOLOMON**

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MAGISTRATE NO:

UNDER SEAL

GOVERNMENT'S MOTION TO SEAL

The United States, by and through its attorney, the United States Attorney for the District of Columbia, hereby respectfully moves this Court to place under seal, until further order of the Court, the Arrest Warrant, the accompanying Affidavit in Support of an Arrest Warrant, this Motion to Seal, and this Court's Order sealing the aforesaid documents. In support of this motion, the United States represents the following:

The affidavit in support of the warrant in this matter contains sensitive law enforcement information regarding an ongoing criminal investigation. If such information were made public at this time, it would impede the ongoing investigation by alerting persons suspected of engaging in criminal conduct of undercover law enforcement activity and other information known to law enforcement. Such premature public disclosure could compromise the ongoing investigation and could undermine the development of evidence in this matter. *See United States v. Hubbard*, 650 F.2d 293, 208 U.S. App. D.C. 399 (D.C. Cir. 1981); *In re Sealed Affidavits*, 600 F.2d 1256 (9th Cir. 1979); *Shea v. Gabriel*, 520 F.2d 879 (1st Cir. 1975). *Cf. In re Search Warrants issued on May 21, 1987*, 1990 WL 113874 (D.D.C. 1990) (information released after the government agreed there was no further need for secrecy). There is, therefore, a compelling governmental interest in maintaining the affidavit under seal. *See Washington Post v. Robinson*, 935 F.2d 282, 289 (D.C. Cir 1991) .

WHEREFORE, the government respectfully requests that this motion be granted.

Respectfully submitted,

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